



From: RAD

To: Elaine Devine - CELA

RAD REFERRAL: 05L-04

TITLE: NEBRASKA REP. FEDERAL CAMPAIGN

DATE RECEIVED: January 26, 2005

DATE TRANSMITTED: January 26, 2005

NOTES:

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463


January 26, 2005

**MEMORANDUM**

TO: LAWRENCE H. NORTON  
GENERAL COUNSEL

THROUGH: JAMES A. PEHRKON   
STAFF DIRECTOR

ROBERT J. COSTA   
DEPUTY STAFF DIRECTOR

FROM: JOHN D. GIBSON   
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF THE NEBRASKA REPUBLICAN FEDERAL CAMPAIGN  
COMMITTEE

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The Nebraska Republican Federal Campaign Committee ("The Committee") is being referred to the Office of General Counsel for amending its 2003 Year-End Report in order to disclose additional disbursements totaling \$51,900.79 (30% increase). According to the 2003-2004 *RAD Review and Referral Procedures for Unauthorized Committees (Standard 7)*, this matter requires further examination by your office. Please note, however, that due to the amount of additional disbursements in question, RAD would recommend that this matter be sent to the Office of Alternative Dispute Resolution for further processing.

Please note this Committee was also referred to your office on August 27, 2004 for a Standard 7 violation (increase in disbursements) which was disclosed on the Committee's 2003 Amended Mid-Year Report. The referral, 04L-11, was subsequently transferred to the Office of Alternative Dispute Resolution by your office for further processing on January 24, 2005.

Copies of any reports or letters filed by the Committee or sent by the Reports Analysis Division and referenced in this referral are available for your review on the FEC Imaging System or web site.

If you have any questions regarding this matter, please feel free to contact Maureen Benitz at 694-1135.

Attachments

## REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: January 26, 2005

ANALYST: Maureen Benitz

- I. COMMITTEE: Nebraska Republican Federal Campaign Committee  
(C00032334)  
Demarus Carlson, Treasurer  
1610 North Street  
Lincoln, NE 68508
- II. RELEVANT STATUTE: 2 U.S.C. §434(b)(4)(A)  
2 U.S.C. §434(b)(4)(H)(v)  
11 C.F.R. §104.3(b)(1)(ix)(A) and (B)  
11 C.F.R. §104.17(b)(3)(i)

## III. BACKGROUND:

**Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)**

On May 18, 2004, The Nebraska Republican Federal Campaign Committee ("the Committee") filed an Amended 2003 Year-End Report in order to disclose additional disbursements totaling \$51,900.79<sup>1</sup> (Image 24961346704).

On January 28, 2004, the Committee originally filed the 2003 Year-End Report covering the period from July 1, 2003 through December 31, 2003. This original report disclosed \$10,029.35 in disbursements on Line 21(a)(i) (Federal Share of Allocated Federal/Non-Federal Activity), \$25,789.73 on Line 21(a)(ii) (Non-Federal Share of Allocated Federal/Non-Federal Activity), and \$70,272.57 on Line 29 (Other Disbursements) of the Detailed Summary Page (Image 24990216192).

On May 18, 2004, the Committee filed an Amended 2003 Year-End Report which disclosed \$10,818.74 in disbursements on Line 21(a)(i) (Federal Share of Allocated Federal/Non-Federal Activity), \$27,819.44 on Line 21(a)(ii) (Non-Federal Share of Allocated Federal/Non-Federal Activity), and \$120,312.73 on Line 29 (Other Disbursements) of the Detailed Summary Page (Image 24961346707) (Attachment 2).

<sup>1</sup> The Committee's original 2003 Year-End Report filed on January 28, 2004 disclosed \$68,757.76 on Line 21(b) (Other Federal Operating Expenditures). However, the Amended Year-End Report filed on May 18, 2004 disclosed a lower amount of \$67,799.29 on Line 21(b). This is \$958.47 less than the amount stated on Line 21(b) of the original report, thereby reducing the overall amount of the total increase in disbursements to \$51,900.79 on the amended report

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Allocated Federal/Non-Federal Activity), and \$120,312.73 on Line 29 (Other Disbursements) [REDACTED] the Detailed Summary Page (Image 240346707) (Attachment 2).

On October 8, 2004, a Request for Additional Information ("RFAI") was sent to the Committee. The RFAI asked for clarification regarding the \$51,900.79 in additional disbursements that were not disclosed on the Committee's original 2003 Year-End Report (Image 24038532880).

On November 9, 2004, the Committee filed a miscellaneous document in response to the RFAI which stated, "In mid-May it was discovered that several disbursements did not pull through onto our original Mid-Year and Year-End reports, causing the activity to be inadvertently omitted from our original reports. The error was discovered, and both reports were amended with all activity included. The totals on the Amended Year-End Report are the correct totals." (Image 24962860184)

To date, no further communication has been received from the Committee regarding this matter.

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NEBRASKA REPUBLICAN FEDERAL CAMPAIGN COMMITTEE  
DEMARUS CARLSON  
FILING FREQUENCY MONTHLY  
1610 N Street

PARTY QUALIFIED  
NE 68508  
LINCOLN

ID #C00032334

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
MS			0	3/10/2004	2	24038334751						
MS			T	8/03/2004	1	24962062176						
MS			2	10/27/2004	1	24962717017						
MS			T	11/09/2004	1	24962860184						
MS			T	11/09/2004	1	24962860957						
RQ	MY	2		4/14/2004	5	24038363469	1/01/2003 6/30/2003					
RQ	MY	2		6/23/2004	3	24038432541	1/01/2003 6/30/2003					
RQ	YE	2		4/21/2004	5	24038390931	7/01/2003 12/31/2003					
RQ	YE	2		10/08/2004	3	24038532880	7/01/2003 12/31/2003					
RQ	YE	2		1/07/2005	3	25038683050	7/01/2003 12/31/2003					
RQ	M2	2		5/05/2004	3	24038403175	1/01/2004 1/31/2004					
RQ	M3	2		5/05/2004	3	24038403157	2/01/2004 2/29/2004					
RQ	M4	2		5/19/2004	3	24038414110	3/01/2003 3/31/2004					
RQ	M4	2		10/08/2004	3	24038532877	3/01/2004 3/31/2004					
RQ	M5	2		6/09/2004	3	24038424303	4/01/2004 4/30/2004					
RQ	M6	2		7/07/2004	3	24038440584	5/01/2004 5/31/2004					
RQ	M7	2		9/15/2004	3	24038514464	6/01/2004 6/30/2004					
RQ	M9	2		10/22/2004	4	24038593328	8/01/2004 8/31/2004					
RQ	M10	2		12/03/2004	4	24038643276	9/01/2004 9/30/2004					
RQ	12G	2		12/22/2004	3	24038671362	10/01/2004 10/13/2004					
3	MY	N	P	7/31/2003	116	23991629657	1/01/2003 6/30/2003	13892	192093	62899	143086	12486
3	MY	A	P	5/14/2004	148	24961316612	1/01/2003 6/30/2003	13892	213457	163710	63639	12486
3	YE	N	P	1/28/2004	168	24990216189	7/01/2003 12/31/2003	48443	195281	174849	68875	10986
3	YE	A	P	5/18/2004	135	24961346704	7/01/2003 12/31/2003	63639	186014	226750	22903	12486

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FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES		BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
3	M2	N	P	2/20/2004	47	24990584097	1/01/2004	1/31/2004	22903	58776	56301	25378	12486
3	M2	A	P	6/03/2004	43	24961508919	1/01/2004	1/31/2004	22903	61481	59045	25339	12486
3	M3	N	P	3/19/2004	45	24990808071	2/01/2004	2/29/2004	25378	50267	60110	15534	12486
3	M3	A	P	6/03/2004	44	24961509672	2/01/2004	2/29/2004	25339	48778	61101	13016	12486
3	M4	N	P	4/20/2004	52	24991145249	3/01/2004	3/31/2004	15534	54453	63824	6164	12486
3	M4	A	P	6/25/2004	50	24961717436	3/01/2004	3/31/2004	13016	54539	54787	12768	12486
3	M4	A	P	11/09/2004	50	24962860519	3/01/2004	3/31/2004	13016	54539	54787	12768	12486
3	M5	N	P	5/19/2004	47	24961355082	4/01/2004	4/30/2004	17468	38941	48364	8046	12486
3	M5	A	P	7/09/2004	56	24961746358	4/01/2004	4/30/2004	12768	43695	46362	10101	12486
3	M6	N	P	6/16/2004	50	24961589175	5/01/2004	5/31/2004	11282	60773	43716	28339	12486
3	M6	A	P	7/09/2004	56	24961747685	5/01/2004	5/31/2004	10101	60763	43716	27148	12486
3	M6	A	P	9/20/2004	57	24971541465	5/01/2004	5/31/2004	10101	60763	43716	27148	12486
3	M7	N	P	7/20/2004	73	24981255236	6/01/2004	6/30/2004	27148	90889	55056	62981	12486
3	M7	A	P	8/04/2004	72	24962063071	6/01/2004	6/30/2004	27148	90849	55056	62941	12486
3	M7	A	P	8/17/2004	73	24962117436	6/01/2004	6/30/2004	27148	94013	59450	61711	12486
3	M7	A	P	9/20/2004	76	24981315668	6/01/2004	6/30/2004	27148	94013	59450	61711	12486
3	M8	N	P	8/20/2004	102	24962196423	7/01/2004	7/31/2004	61711	179213	105102	135822	12486
3	M8	A	P	9/20/2004	106	24971544168	7/01/2004	7/31/2004	61711	179213	105102	135822	12486
3	M9	N	P	9/20/2004	89	24971553053	8/01/2004	8/31/2004	135822	60670	62673	133820	12486
3	M10	N	P	10/20/2004	104	24962623550	9/01/2004	9/30/2004	133820	250007	151991	231836	12486
3	M10	A	P	10/21/2004	104	24962678144	9/01/2004	9/30/2004	133820	250007	151991	231836	12486
3	M10	A	P	1/05/2005	104	25980027826	9/01/2004	9/30/2004	133820	250007	151991	231836	12486
3	12G	N	P	10/21/2004	49	24962678333	10/01/2004	10/13/2004	231836	66209	104959	193086	12486
3	30G	N	P	12/02/2004	131	24991452968	10/14/2004	11/22/2004	193086	140494	324346	9234	12486
TOTAL										1459333	1463992		

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Nebraska Republican Federal Campaign Committee (C00032334)  
2003 Year-End Report/Amended 2003 Year-End Report  
Disbursement Overview

Line	Original 2003 Year-End Report (Image 24990216192)	Amended 2003 Year- End Report (Image 24961346704)	Disbursement Difference
21(a)(i)	\$10,029.35	\$10,818.74	\$789.39
21(a)(ii)	\$25,789.73	\$27,819.44	\$2,029.71
21(b)*	\$68,757.76	\$67,799.29	\$958.47
29	\$70,272.57	\$120,312.73	\$50,040.16

\* Decrease in activity.

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